



**Credit Union  
Legislative Action Council**

A Member of the Credit Union System

Suite 300  
805 15th Street NW  
Washington, D.C.  
20005-2207

**RECEIVED  
FEDERAL ELECTION  
COMMISSION MAIL ROOM**  
(202) 682-4200

**2000 JAN -5 A 9 13**

January 4, 2000

Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: April, May, and September Monthly Reports

Dear Ms. Kitchen:

I am in receipt of your letter dated December 1, 1999 regarding the Credit Union Legislative Action Council of CUNA's ("CULAC") April, May, and September Monthly Reports. Your letter identifies several in-kind contributions made by CULAC which had initially been made by other persons or entities and asks for an explanation of the circumstances surrounding these transactions. As permitted by law, CULAC sponsors events for candidates and treats the expenses of such events as in-kind contributions to the recipient candidate. It is CULAC's practice to pay for such expenses in advance of the event. However, on some occasions the event may cost more than anticipated. In those instances, an individual employee of the Credit Union National Association ("CUNA") or another member of CUNA's restricted class will use a personal credit card to pay some of the costs of the event. CULAC then reimburses the individual for the cost overruns and treats the additional expenses as an in-kind contribution to the candidate.<sup>1</sup>

<sup>1</sup> CULAC recognizes that payments by an individual are treated as contributions until reimbursed pursuant to 11 C.F.R. § 116.5(b). However, the majority of the contributions highlighted by you were within the individual's personal limit to the candidate. Moreover, even when a contribution exceeds a limit, the candidate is permitted to seek a redesignation of the contribution within sixty days pursuant to 11 C.F.R. § 110.1(b)(5). In this case, CULAC reimbursed the individual well within sixty days and treated the expenses as an in-kind